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MEDICAL RESPONSE WEST

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

**KELLY KJELSTROM**

Plaintiff,

vs.

**AMERICAN MEDICAL  
RESPONSE WEST, a California  
Corporation, and DOES 1 through 30,**

Defendants.

Case No.: 1:22-cv-00513-JLT-BAM

Judge: Hon. Barbara A. McAuliffe

Complaint Filed: February 25, 2022

**JOINT STIPULATION EXTENDING  
EXPERT DISCLOSURES,  
SUPPLEMENTAL EXPERT  
DISCLOSURES AND EXPERT  
DISCOVERY DEADLINES; ORDER**

Plaintiff KELLY KJELSTROM (“Plaintiff”) and Defendant AMERICAN MEDICAL RESPONSE WEST (“Defendant”) (together, the “Parties”), by and through their respective counsel of record, hereby agree and stipulate to the following:

1. Due to the impact of the current Southern California wildfires on Brock & Gonzales, LLP, including power shut-offs, school closures and evacuations, the parties have met and conferred regarding the existing deadlines for Expert Disclosures, Supplemental Expert Disclosures and Expert Discovery;

2. The current deadline for Expert Disclosures is January 10, 2025, the deadline for Supplemental Expert Disclosures is January 31, 2025, and the Expert Discovery Cutoff is March 14, 2025;

3. The parties agree to extend these deadlines to allow additional time for expert preparation and disclosures;

4. The new deadlines shall be as follows:

- **Expert Disclosures:** January 24, 2025
- **Supplemental Expert Disclosures:** February 14, 2025
- **Expert Discovery Cutoff:** March 28, 2025

IT IS SO STIPULATED.

DATED: January 13, 2025

BROCK & GONZALES, LLP

By: /s/ Bianca M. Dulgheru

D. AARON BROCK  
CHRISTOPHER P. BRANDES  
BIANCA M. DULGHERU  
Attorneys for Plaintiff

DATED: January 10, 2025 PAYNE & FEARS LLP

By: */s/ Taylor B. Brown*

TYLER B. RUNGE  
TAYLOR B. BROWN  
Attorneys for Defendant AMERICAN  
MEDICAL RESPONSE WEST

BROCK &  
GONZALES

**ORDER**

Pursuant to the parties' stipulation and good cause appearing, the Court orders that: the Expert Disclosure deadline is extended from January 10, 2025, to **January 24, 2025**; the Supplemental Expert Disclosure is extended from January 31, 2025, to **February 14, 2025**; and the Expert Discovery Cutoff is extended from March 14, 2025, to **March 28, 2025**. The Pretrial Motion Filing Deadline remains April 11, 2025, Pretrial Conference remains set for September 15, 2025, at 1:30 p.m. in Courtroom 4 (JLT), and an estimated 10-day Jury Trial remains set for November 12, 2025 at 8:30 a.m. in Courtroom 4 (JLT). (*See* Doc. 29.)

IT IS SO ORDERED.

Dated: **January 13, 2025**

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE